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April 24, 2024

Via ECF

The Honorable Sarah L. Cave
United States Magistrate Judge
United States District Court
For the Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Alexandra Noh v. adMarketplace, Inc. and Eugene Kilberg, 24-CV-2107 (ER)

Your Honor:

We represent Defendant adMarketplace, Inc., (“adMarketplace”) in the above-referenced action. Pursuant to Rule 1(D) of Your Honor’s Individual Practices in Civil Cases, we write to respectfully request that the Court extend Defendant adMarketplace’s time to answer, move or otherwise respond to the Complaint filed in this action. Defendant adMarketplace’s response to the Complaint is currently due on April 29, 2024, and Defendant adMarketplace respectfully requests a forty-five (45) day extension of time, until June 13, 2024, to respond to the Complaint. This is Defendant adMarketplace’s first request for an extension of time to respond to the Complaint, and Counsel for Plaintiff Melissa Vo consents to this request. If granted, this request for an extension of time will not affect any other scheduled dates in this matter.

The reason for the instant request is that we were just retained and need time to investigate in order to thoroughly and properly respond to Plaintiff’s claims.

We thank the Court in advance for its consideration of this request.

Respectfully submitted,

/s/ Melissa C. Rodriguez

Melissa C. Rodriguez

Attorney for Defendant adMarketplace

cc: All Counsel of Record (via ECF)

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